

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

**MOTION FOR PROTECTIVE ORDER PROHIBITING PLAINTIFFS FROM
DEPOSING SERGEY BRIN, SUNDAR PICHAI, AND NEAL MOHAN**

Google LLC moves pursuant to Federal Rule of Civil Procedure 26(c)(1) for a protective order forbidding the State of Texas, et al. from seeking Rule 30(b)(1) deposition testimony Google's executives, Mr. Sergey Brin, Mr. Sundar Pichai, and Mr. Neal Mohan. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached.

Dated: April 9, 2024

Respectfully submitted,

/s/ R. Paul Yetter

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CERTIFICATE OF CONFERENCE

I certify that on this 9th day of April 2024, counsel has complied with the meet and confer requirement of Local Rule CV-7(h). Specifically, Google (Paul Yetter, Justina Sessions, Mollie Bracewell) conferred by telephone with Plaintiffs counsel (Geraldine Young) on March 25, 2024. Google (Justina Sessions, Mollie Bracewell) conferred by telephone with Plaintiffs counsel (Geraldine Young) again on March 27, 2024. Plaintiffs refused to withdraw their deposition notices to Messrs. Brin and Pichai, leaving the parties at an impasse.

Google (Daniel Bitton, Kenina Lee, and Allison Vissichelli) additionally conferred by telephone with Plaintiffs' counsel (Geraldine Young) on March 29, 2024 regarding Plaintiffs' deposition notice of Neal Mohan. The parties further corresponded by email regarding Mr. Mohan's deposition notice on March 29, 2024, April 2, 2024, and April 4, 2024. Based on the parties' meet and confer and subsequent correspondence, the parties are also at impasse with respect to Plaintiffs' deposition notice to Mr. Mohan.

/s/ R. Paul Yetter

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